

JUL 24 2019

JULIA C. DUDLEY, CLERK
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
DANVILLE

UNITED STATES OF AMERICA

v.

PAULETTE GENETHA TOLLER

Case No.

4:19CR28

Violations: 21 U.S.C. § 841(a)(1)

21 U.S.C. § 843(a)(3)

INDICTMENT

COUNT ONE

The Grand Jury charges that:

1. Between and including in or about June 2017 and June 2019 in the Western District of Virginia and elsewhere, PAULETTE GENETHA TOLLER knowingly and intentionally possessed with the intent to distribute Schedule II controlled substances, including the following (all amounts are approximate):

- a. 6,088 oxycodone pills
- b. 5,246 hydrocodone pills, and
- c. 65 hydromorphone pills.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWO

The Grand Jury charges that:

1. Between and including in or about June 2017 and June 2019 in the Western District of Virginia and elsewhere, PAULETTE GENETHA TOLLER knowingly and intentionally possessed with the intent to distribute Schedule III controlled substances, including approximately 760 codeine pills.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E).

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COUNT THREE

The Grand Jury charges that:

1. Between and including in or about June 2017 and June 2019 in the Western District of Virginia and elsewhere, PAULETTE GENETHA TOLLER knowingly and intentionally possessed with the intent to distribute Schedule IV controlled substances, including the following (all amounts are approximate):

- a. 713 lorazepam pills,
- b. 270 alprazolam pills,
- c. 240 zolpidem tartrate pills,
- d. 20 clonazepam pills, and
- e. 20 temazepam pills.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(2)

COUNT FOUR

The Grand Jury charges that:

1. Between and including in or about June 2017 and June 2019 in the Western District of Virginia and elsewhere, PAULETTE GENETHA TOLLER knowingly and intentionally acquired and obtained possession of controlled substances by misrepresentation, fraud, forgery, deception, and subterfuge, including the following (all amounts are approximate):

- a. 6,088 oxycodone pills
- b. 5,246 hydrocodone pills,
- c. 65 hydromorphone pills.
- d. 760 codeine pills,
- e. 713 lorazepam pills,

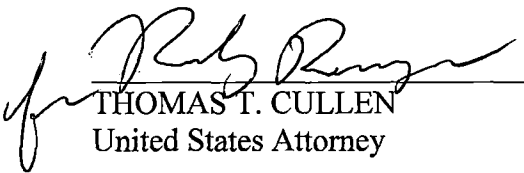
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- f. 270 alprazolam pills,
- g. 240 zolpidem tartrate pills,
- h. 20 clonazepam pills, and
- i. 20 temazepam pills.

3. All in violation of Title 21, United States Code, Sections 843(a)(3) and 843(d)(1).

A TRUE BILL, this 24 day of July, 2019.

s/ Grand Jury Foreperson


THOMAS T. CULLEN
United States Attorney

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